

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.)
)
) No. 19-Cr-10421-DPW(s)
YUEN LIU-TORRES, et al.)
)
Defendants.)

JOINT FINAL STATUS REPORT PURSUANT TO LOCAL RULE 116.5(b)

Pursuant to Local Rule 116.5(b), the United States, by its undersigned counsel, respectfully submits the following joint status report regarding the above-captioned matter, which is set for a status conference at 2:00 p.m. on **Thursday, January 28, 2021**. Government counsel has provided a draft of this status report to counsel for the defendants and incorporated changes suggested by counsel. The defendants in this case are charged with two counts of conspiracy to distribute and to possess with intent to distribute cocaine, in violation of 21 U.S.C. § 846; conspiracy to distribute and to possess with intent to distribute heroin/fentanyl, in violation of 21 U.S.C. § 846; conspiracy launder monetary instruments, in violation of 18 U.S.C. § 1956(h); and three counts of possession with intent to distribute various controlled substances in violation of 21 U.S.C. § 841.

I. Defendants Requesting Transfer to the District Judge for a Rule 11 Hearing

Defendants (2) Victor Alejandro-Carrillo and (12) Alexander Santiago Medina are in the process of obtaining Rule 11 dates before the District Judge.

II. Defendants Requesting Additional 45 Days to Review Discovery

The undersigned Assistant U.S. Attorney communicated with counsel for (5) Jose L. Diaz-Fontanez concerning information related to prior convictions; the parties anticipate resolving those issues within the next two weeks. In addition, counsel for the remaining defendants are in the

process of evaluating the extensive discovery materials and conducting discussions about their cases may be resolved prior to trial. Defense counsel request a further status conference in approximately 45 days, as the Court's calendar allows.

III. Periods of Excludable Delay

The United States, with the assent of defense counsel, respectfully submits that the Court should exclude the time between January 28, 2021, and any further status conference under the Speedy Trial Act, pursuant to 18 U.S.C. §§ 3161(h)(7)(A), 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv), due to the voluminous discovery that has already been produced and the time necessary for counsel to review those discovery materials with the defendants. Given the existence of these factors, the ends of justice served by granting defense counsel sufficient time to review discovery materials is necessary for effective preparation and outweighs the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Craig E. Estes
Craig E. Estes, BBO#670370
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Craig E. Estes
CRAIG E. ESTES
Assistant U.S. Attorney

Dated: January 22, 2021